

**McELROY, DEUTSCH, MULVANEY & CARPENTER, LLP**  
ATTORNEYS AT LAW

1300 MOUNT KEMBLE AVENUE  
P.O. BOX 2075  
MORRISTOWN, NEW JERSEY 07962-2075  
(973) 993-8100  
FACSIMILE (973) 425-0161

GEORGE C. JONES  
Direct Dial: (973) 401-7145  
gjones@mdmc-law.com

October 19, 2020

**VIA ECF**

Hon. Zahid N. Quraishi, U.S.M.J.  
Clarkson S. Fisher Federal Building  
and U.S. Courthouse  
402 E. State Street  
Trenton, New Jersey 08608

Re: *UMG Recordings, Inc. et al. v. RCN Telecom Services, LLC et al.*  
Civil Action No. 19-17272 (MAS) (ZNQ)

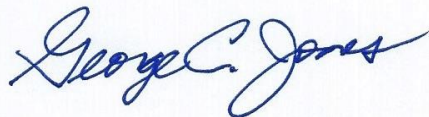
Dear Judge Quraishi:

This firm, along with our co-counsel Jenner & Block LLP and Stein Mitchell Beato & Missner LLP, represents plaintiffs in the referenced matter. Defendant RCN Telecom Services, LLC (“RCN”) recently filed Counterclaims against plaintiffs as well against two additional counterclaim defendants, Recording Industry Association of America, Inc. (“RIAA”) and Rightscorp Inc. (ECF No. 104.) RIAA has authorized counsel for plaintiffs to accept service of the Counterclaims on its behalf, and we have done so. In turn, plaintiffs and RIAA have requested that RCN agree to an extension of time through and including November 6, 2020, for them to respond to the allegations in the Counterclaims. RCN has consented to that request.

I enclose in this regard for the Court’s consideration a proposed Consent Order Extending Time to Answer, Move or Otherwise Respond to Counterclaims. No previous extensions of time have been requested or granted, and neither plaintiffs nor RIAA have availed themselves of the 14-day extension of time to answer or reply pursuant to Local Civil Rule 6.1(b). We respectfully request that the Court enter the proposed form of Order.

Respectfully yours,

McELROY, DEUTSCH, MULVANEY & CARPENTER, LLP



GEORGE C. JONES

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Enclosure

cc: All counsel (by ECF and e-mail)